UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

NATIONAL LABOR RELATIONS BOARD,

Petitioner,

V.

ASHFORD TRS NICKEL, LLC, ASHFORD HOSPITALITY TRUST, INC., and all AHT affiliated enterprises, a single business enterprise and a single employer,

Respondents.

Case No. 18-71872

ANSWER TO APPLICATION FOR ENFORCEMENT

The above-named Respondent hereby answers and states the following:

- 1. Respondent admits the entry of the order by the National Labor Relations Board on February 1, 2018.
- 2. Respondent admits the jurisdiction and venue of this Court.
- 3. Respondent denies the order should be enforced.

Respectfully submitted this 20th day of July, 2018.

STOKES WAGNER, ALC

/s/ Karl M. Terrell

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Counsel for Respondent

Case: 18-71872, 07/20/2018, ID: 10950046, DktEntry: 10, Page 3 of 3

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on this 20th day of July, 2018, I caused this ANSWER TO APPLICATION FOR ENFORCEMENT to be filed electronically with the Clerk of the Court using the CM/ECF System, which will send notice of such filing to the following registered CM/ECF users:

Linda Dreeben, Deputy Associate General Counsel NLRB - National Labor Relations Board 1015 Half Street SE Washington, DC 20003

Joel Heller NLRB - National Labor Relations Board 1015 Half Street SE Washington, DC 20003

Kira Dellinger Vol NLRB - National Labor Relations Board 1015 Half Street SE Washington, DC 20003

/s/ Karl M. Terrell

Counsel for Respondent